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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH**

In re:

AMMON EDWARD BUNDY
Debtor.

Bankruptcy No. 24-23530

Chapter 7

Honorable William T. Thurman

**ST. LUKE'S CREDITORS' MOTION PURSUANT TO FED. R. BANKR. PRO. 2004
FOR AN ORDER AUTHORIZING AN EXAMINATION OF, AND PRODUCTION OF
DOCUMENTS BY, RYAN C. BUNDY, WITHOUT PRIOR NOTICE OR HEARING
PURSUANT TO LOCAL RULE 2004-1**

St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth,
Natasha Erickson, M.D., and Tracy Jungman, NP (together the "St. Luke's Creditors"), submit
their Motion for Rule 2004 Examination of Ryan C. Bundy, as follows:

1. The St. Luke's Creditors are judgment creditors of debtor Ammon Bundy ("Debtor"). Bundy committed intentional torts against them. They obtained a judgment in Idaho in excess of \$50 million against Debtor in August 2023. Debtor's judgment liability remained in excess of \$50 million on the petition date.

2. On January 24, 2024, Debtor Ammon Bundy ("Debtor") and his wife transferred \$487,167.36 in cash owned by them to a Utah credit union account owned by a related entity, Abish-husbondi Inc. At that time, on information and belief, Bundy owned all of the stock in Abish-husbondi Inc.

3. The transfer was an obvious fraudulent conveyance.

4. Eight days later, on February 1, 2024, Debtor caused \$425,000 of the money to be transferred by Abish-Husbondi Inc. to a credit union account that his brother, Ryan C. Bundy, owned. Debtor was obviously trying to put the money beyond the reach of the St. Luke's Creditors.

5. Of course, the St. Luke's Creditors wish to discover what became of that money.

6. Under Bankruptcy Rule 2004, this Court can empower the St. Luke's Creditors to take discovery from Ryan C. Bundy. Under Local Rule 2004-1, the Court can order such discovery without notice or hearing.

7. The St. Luke's Creditors move this Court to enter an Order authorizing the St. Luke's Creditors to conduct an examination of the Ryan C. Bundy and compel production of documents from him.

8. The St. Luke's Creditors shall give Ryan C. Bundy no fewer than 14 days' prior written notice of the examination in accordance with Local Rule 2004-1(3)(A) absent a stipulation with him.

9. The St. Luke's Creditors shall compel Ryan C. Bundy's attendance by a subpoena in accordance with Bankruptcy Rule 2004(c), Bankruptcy Rule 9106, and Local Rule 2004-1(3)(A).

WHEREFORE, the St. Luke's Creditors seek relief under Bankruptcy Rule 2004 as set forth above without further notice or hearing. A proposed order has been lodged herewith.

DATED this 27th day of November, 2024.

HOLLAND & HART LLP

/s/ Engels Tejeda

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St. Luke's Regional Medical Center, Ltd.,
Chris Roth, Natasha Erickson, M.D., and
Tracy Jungman, NP*

CERTIFICATE OF SERVICE

I hereby certify that on November 27, 2024, I electronically filed the foregoing **ST. LUKE'S CREDITORS' MOTION PURSUANT TO FED. R. BANKR. PRO. 2004 FOR AN ORDER AUTHORIZING AN EXAMINATION OF, AND PRODUCTION OF DOCUMENTS BY, RYAN C. BUNDY, WITHOUT PRIOR NOTICE OR HEARING PURSUANT TO LOCAL RULE 2004-1** with the United States Bankruptcy Court for the District of Utah by using the CM/ECF system. I further certify that the parties of record in this case, as identified below, are registered CM/ECF user.

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